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7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **SAN FRANCISCO DIVISION**
10

11 WAYMO, LLC,

12 Plaintiff,

13 vs.

14 UBER TECHNOLOGIES, INC;
15 OTTOMOTTO LLC; and OTTO TRUCKING
LLC,

16 Defendants.
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Case No.: 3:17-CV-00939 (WHA)

**DECLARATION OF JONATHAN
PATCHEN IN SUPPORT OF NON-
PARTY LIOR RON'S LETTER BRIEF IN
RESPONSE TO WAYMO'S MOTION TO
COMPEL INSPECTION OF IMAGES**

Magistrate Judge Jacqueline S. Corley

1 I, JONATHAN PATCHEN, declare as follows:

2 1. I am a partner in the law offices of Taylor & Patchen, LLP, a member in good
3 standing of the bar of the State of California, and am admitted to practice before the United States
4 District Court for the Northern District of California. I have personal knowledge of the matters set
5 forth in this declaration, and if called upon to testify as a witness in this case, I could and would
6 testify competently under oath to all of the matters set forth in this declaration. This declaration is
7 submitted in support of Non-Party Lior Ron's Letter Brief in Response to Waymo's Motion to
8 Compel Inspection of Images filed concurrently herewith.

9 2. Attached hereto as Exhibit 1 is a true and correct copy of an email and attachment
10 from Linda Brewer to counsel regarding a proposed protocol for the forensic review of the images,
11 dated September 26, 2017.

12 3. Attached hereto as Exhibit 2 is a true and correct copy of an excerpt to the hearing
13 transcript from the September 18, 2017 hearing in front of Judge Corley.

14 4. Starting at approximately 1:30 pm this afternoon, I participated in a call with
15 representatives of Discovia, counsel for Uber, counsel for Mr. Levandowski, and counsel for
16 Waymo during which the protocol referenced in Exhibit 1 was discussed. Counsel for Mr.
17 Levandowski agreed to circulate some minor clarifications to the proposed protocol.

18 I declare under penalty of perjury, under the laws of the United States of America, that the
19 foregoing is true and correct. Executed this 26th day of September, 2017, at San Francisco,
20 California.

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22 /s/ Jonathan A. Patchen
23 JONATHAN A. PATCHEN
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